

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KRISTEN CREIGHTON, §
§
Plaintiff, §
§
v. §
§
HOOMAN KARAMIAN a/k/a §
§
NIK RICHIE, §
§
JAMES GRDINA, JOHN GRDINA, §
§
FRANK DIMAGGIO, AND §
§
DIRTY WORLD, LLC d/b/a §
§
THEDIRTY.COM, §
§
Defendants. §
§

CIVIL ACTION NO. 10-1725
JURY

PLAINTIFF'S EMERGENCY MOTION FOR EXPEDITED
HEARING ON APPLICATION FOR RESTRAINING ORDER

TO THE HONORABLE JUDGE NANCY ATLAS:

Kristen Creighton (hereinafter "Plaintiff" or "Creighton") files this Emergency Motion for Expedited Hearing on Application for Restraining Order, seeking an expedited hearing.

A.
EMERGENCY MOTION

1. Defendant Hooman Karmaian a/k/a Nik Richie, the architect of the campaign against Plaintiff, was served with the Original Complaint on May 14, 2010. (See Proof of Service; Ex. A).
2. Since the filing of the Complaint, Defendant Nik Richie and Dirty World, LLC have refused to take down the postings about Plaintiff.
3. On page one and two of the Houston portion of www.thedirty.com, the highly invasive postings about Plaintiff continue:

Web Images Videos Maps News Shopping Gmail more ▾



Kristen Creighton

About 113,000 results (0.38 seconds)

Everything

More

Show search tools

[Kristen Creighton Is My Mona Lisa](#)

Click on both images to enlarge Rarely do I get an opportunity in my life to prove myself and show that I am as great as you think I am. There is a girl, thedirty.com/2010/05/kristen-creighton-is-my-mona-lisa/ - 1 hour ago

[The Dirty | Nik Richie + Dirty Army intel, opinions, gossip ...](#)

May 10, 2010 ... Kristen Creighton asked me to remove the post and like a true ... Now devastated Kristen Creighton decided to blame Nik Richie and sued me ... thedirty.com/ - 51 minutes ago - Similar

[Kristen Creighton | Facebook](#)

Friends: Kerry Gallagher Rowan, Michael Speranza, Chris Daltry, Jay Capaldi, Michael Owen Kristen Creighton is on Facebook. Join Facebook to connect with Kristen Creighton and others you may know. Facebook gives people the power to share and ... www.facebook.com/people/Kristen-Creighton/1097828954 - Cached

[Kristen CREIGHTON - MODEL - kristencreighton - ID:3061 - Houston ...](#)

Feb 8, 2008 ... Name, Kristen CREIGHTON. Member / ID#, 3061. City, Houston. State/Province, Texas. Country, UNITED STATES ... www.weselectmodels.com/view/kristencreighton.html?id... - Cached - Similar

[Kristen Creighton, Creative Director, Carnegie Communications Inc ...](#)

Kristen Creighton, Creative Director, Carnegie Communications Inc of Communications Inc's information - including email, business address ... www.spoke.com/info/p6VC1qk/KristenCreighton - Cached - Similar



THE DIRTY ARMY: Nik, I was watching your Kristen Creighton has herpes post to see how fast you could make her name infamous for having herpes and I just wanted to tell you it took 23 minutes. No amount of money is worth the wrath you can put on a persons life. You are the Godfather of the internet. I decided this time. Kristen you probably should have thought this through a bit.

(See Website; Ex. B).

4. Not only do the postings continue, but the person submitting this Google snapshot acknowledges the shear speed by which Defendants' postings were made available on Google—23 minutes. This person acknowledges, “No amount of money is wroth the wrath you can put on a persons life.” *Id.*

5. In Defendant Nik Richie’s own words there is more to come:

DIRTY ARMY, I want you to be aware that I did not take down the Kristen Creighton posts for any type of legal reason. They are strictly in a holding pattern with much more to come. I think I proved my point to Kristen Creighton and hopefully she sees what her life can become overnight if this is the route she chooses. I had a heart back in 2009 when she asked me to remove her very first post and I am trying to have one now. The facts are the facts... Kristen Creighton has herpes and her lawyer Chris Bell lied to us on record about it.

Id.

6. Because Defendants are emboldened by the “fight” they want to take to Plaintiff, they flaunt this litigation and the sanctity of due process. Irreparable harm is exacted upon Plaintiff each additional minute these postings continue.

7. Plaintiff requests this Court to grant an expedited hearing on her Application for Temporary Restraining Order, scheduling the hearing during the week of May 24, 2010.

Respectfully submitted,

By: /s/ Chris Bell

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that I forwarded a copy of this pleading to an individual who has represented that he is counsel for Defendants as follows on this 20th day of May 2010, addressed as follows:

David S. Gingras
Gingras Law Office, PLLC
Fax: (480) 248-3196
David.Gingras@webmail.azbar.org

/s/ Chris Bell _____
Chris Bell